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9 **Attorneys for Defendant**  
10 **SAXON MORTGAGE SERVICES, INC.**

11 **UNITED STATES DISTRICT COURT**

12 **NORTHERN DISTRICT OF CALIFORNIA - SAN JOSE DIVISION**

13 OSCAR MADRIGAL SENCION, an individual

Case No.: 5:10-cv-03108-JF

14 Plaintiff,

15 v.

16 SAXON MORTGAGE SERVICES, INC., a  
business of unknown form; OCWEN LOAN  
SERVICING, LLC; and, DOES 1 through 100,  
inclusive,

Defendants.

**STIPULATION AND [PROPOSED]  
ORDER CONTINUING DATES AND  
DEADLINES IN THE COURT'S CASE  
MANAGEMENT ORDER**

17  
18 COME NOW Plaintiff OSCAR MADRIGAL SENCION ("Plaintiff"), Defendant SAXON  
19 MORTGAGE SERVICES, INC. ("Saxon"), and Defendant OCWEN LOAN SERVICING, LLC  
20 ("Ocwen") (collectively, "Parties") and hereby stipulate as follows.

21 WHEREAS, the Court entered a case management order on January 20, 2011, scheduling a  
22 trial date, pretrial conference, and other dates and deadlines, including, but not limited to, a fact  
23 discovery cut-off of May 2, 2011;

24 WHEREAS, Plaintiff thereafter filed his second amended complaint, which added a new  
25 defendant, Deutsche Bank National Trust Company, as trustee ("Deutsche Bank");

26 WHEREAS, on April 8, 2011, the Court reassigned this case to the Honorable Jeremy Fogel;

27 WHEREAS, on April 11, 2011, the Court vacated the trial date and the pretrial conference  
28 date, apparently because of the judicial reassignment of the case;

WHEREAS, Deutsche Bank has not yet appeared in the case, and the time for Deutsche Bank to respond to the second amended complaint has not yet expired; and

WHEREAS, Saxon and Ocwen have commenced written discovery, but the parties believe that conducting the additional necessary discovery, in particular the necessary depositions, before the existing (May 2, 2011) fact discovery cutoff would be inefficient because the case is not yet entirely at issue and there is now no trial date;

NOW, THEREFORE, the Parties stipulate and agree that each of the dates and deadlines in the Court's January 20, 2011 case management order shall be continued 120 calendar days, as follows:

1. Fact Discovery Cutoff: August 30, 2011;
2. Designation of Opening Experts with Reports: September 29, 2011;
3. Designation of Rebuttal Experts with Reports: October 29, 2011;
4. Last Day for Dispositive Motion Hearing: January 29, 2012.

IT IS SO STIPULATED.

DATED: April 13, 2011

WOLFE & WYMAN LLP

By: /s/ Marcus T. Brown  
STUART B. WOLFE  
MARCUS T. BROWN  
**Attorneys for Defendant**  
**SAXON MORTGAGE SERVICES, INC.**

DATED: April 13, 2011

CENTURY LAW GROUP LLP

By: /s/ Rizza Gonzales  
EDWARD O. LEAR  
RIZZA GONZALES  
**Attorneys for Plaintiff**  
**OSCAR MADRIGAL SENCION**

DATED: April 13, 2011

HOUSER & ALISON APC

By: /s/ Brian Edwards  
BRIAN EDWARDS  
**Attorneys for Defendant**  
**OCWEN LOAN SERVICING, LLC**

**~~PROPOSED~~ ORDER**

Having reviewed the foregoing stipulation, and good cause appearing, the Court ORDERS that the dates and deadlines in the Court's January 20, 2011 case management order are hereby continued 120 calendar days, as follows:

1. Fact Discovery Cutoff: August 30, 2011;
2. Designation of Opening Experts with Reports: September 29, 2011;
3. Designation of Rebuttal Experts with Reports: October 29, 2011;
4. Last Day for Dispositive Motion Hearing: January 29, 2012.

IT IS SO ORDERED.

Dated: 4/14/11, 2011

  
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JUDGE OF THE U.S. DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA